

# Exhibit D

**LAW OFFICE OF BEN GATES, P.C.**  
7015 SNIDER PLAZA, SUITE 202 | DALLAS, TEXAS 75205

February 28, 2020

**VIA EMAIL: [mjones@henryandjones.com](mailto:mjones@henryandjones.com)**

Michael L. Jones  
Henry & Jones, LLP  
16901 Dallas Parkway, Suite 202  
Addison, Texas 75001

**RE: Notice of Claim to Stratton Securities, Inc.**

Dear Mike:

I, along with Poncho Nevárez, have been retained by El Campo Ventures, LLC to pursue litigation that includes claim(s) against your client Stratton Securities, Inc. (SSI) for its breach of the May 2, 2019 partnership agreement and/or written contract between the parties.

We have reviewed your letter to Dan Gattis dated August 23, 2019. Your contention that “Stratton has absolutely no obligation to pay El Campo any amount based upon the Lease” is patently false. Please see the attached May 14, 2019 text message written by Shannon Stratton that clearly promises to compensate our client for the resulting lease: “Should they wish to lease, SSI will pay El Campo directly as if it were a sale.”

More importantly, El Campo and Stratton were/are partners. Attached for your review are the May 1, 2019 email in which SSI communicated its intent to enter into a partnership with El Campo along with the May 18, 2019 text message where Shannon Stratton states that she tried to explain to Pat Rice that El Campo was/is a partner in the deal.

We certainly are glad that Stratton agrees El Campo provided value, although we would consider an amount that may eventually exceed \$26 million to qualify as “tremendous” rather than merely “some.” El Campo is willing to settle its claim(s) for \$4,000,000.00. If this sum is not paid within 30 days of receipt of this notice, a lawsuit seeking all available remedies will be filed against your client.

Should you have any questions, please do not hesitate to contact me.

Sincerely,



Benjamin P. Gates

cc: Poncho Nevárez ([anc@nevarezlawgroup.com](mailto:anc@nevarezlawgroup.com))